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Attorneys for Plaintiff Sandoz Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Sandoz Inc. and RareGen, LLC

Plaintiffs,

v.

United Therapeutics Corporation and
Smiths Medical ASD, Inc.

Defendants.

Case No. 3:19-cv-10170-BRM-LHG

**SANDOZ INC.'S NOTICE OF
OPPOSED MOTION TO SEAL**

Pursuant to Local Civil Rule 5.3

Return Date: December 16, 2019

PLEASE TAKE NOTICE that on December 16, 2019, or as soon thereafter as counsel may be heard, Plaintiff Sandoz Inc. (“Sandoz”), by and through its undersigned attorneys, shall move before the Honorable Lois H. Goodman, United

States Magistrate Judge, District of New Jersey, for an Order in the above-captioned matter, pursuant to Local Civil Rule 5.3(c), sealing portions of the following:

1. ECF No. 106-1: Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction;

2. ECF No. 108: Affidavit of Damian deGoa in Support of Plaintiffs' Motion for Preliminary Injunction and certain exhibits appended thereto as outlined in Exhibit A;

3. ECF No. 109: Expert Report of Mohan Rao, Ph.D. in Support of Plaintiffs' Motion for Preliminary Injunction;

4. ECF No. 110: Declaration of John M. Collins, Ph.D. in Support of Plaintiffs' Motion for Preliminary Injunction;

5. ECF No. 112: Certain exhibits appended to the Declaration of Ethan Glass in Support of Plaintiffs' Motion for Preliminary Injunction as outlined in Exhibit A;

6. ECF No. 122: Defendants' Brief in Opposition to Plaintiffs' Motion for Preliminary Injunction;

7. ECF No. 124: Expert Report of Dnyanesh Talpade in Support of Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction;

8. ECF No. 125: Expert Report of Eric M. Gaier, Ph.D. in Support of Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction;

9. ECF Nos. 131-133: Declaration of Edward C. Barnidge in Support of Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction and certain exhibits appended thereto as outlined in Exhibit A;

10. ECF No. 136-1: Amended Exhibit T to the Declaration of Edward C. Barnidge in support of Defendants' Opposition to Plaintiffs' Motion for Preliminary Injunction.

11. ECF No. 137: Certain exhibits and Appendix A to Plaintiffs' Supplemental Evidence in Support of Plaintiffs' Motion for Preliminary Injunction.

PLEASE TAKE FURTHER NOTICE that in support of the opposed motion, Sandoz will rely upon the accompanying Declaration of Jenny Kramer.

PLEASE TAKE FURTHER NOTICE that a proposed Order containing Findings of Fact and Conclusions of Law is being filed herewith; and

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 5.3(c)(1), no brief is necessary in support of the opposed motion, as Sandoz does not believe a brief would assist the Court.

Dated: November 15, 2019

/s/ Jenny Kramer

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